

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROBERT ROMOFF, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

JOHNSON & JOHNSON CONSUMER INC.,

Defendant.

Civil Action No. 2:22-cv-03520-MRP

**UNOPPOSED MOTION TO VACATE
RULE 16 CONFERENCE AND RESET
IN 30 DAYS**

Judge: Mia Roberts Perez

Defendant Johnson & Johnson Consumer Inc. (“JJCI”) respectfully moves the Court to (1) vacate the current July 2, 2024 Rule 16 conference and the related June 21, 2024 deadline to complete and submit a joint report pursuant to Fed. R. Civ. P. 26(f) and (2) to reset these deadlines for 30 days or at a date of the court’s convenience thereafter. Plaintiff Robert Romoff does not oppose this motion.

The parties have been and continue to engage in good-faith discussions in an effort to streamline issues in the case. These discussions are ongoing and the parties anticipate that they will be concluded within the next several weeks.

For the foregoing reasons, JJCI respectfully moves this Court to vacate the current July 2, 2024 Rule 16 conference and the related June 21, 2024 deadlines to complete and submit a joint report pursuant to Fed. R. Civ. P. 26(f) and to reset these deadlines for 30 days or at a date of the court’s convenience thereafter.

This motion is made following a conference of counsel, which took place on June 12, 2024. Plaintiff’s counsel has indicated that Plaintiff agrees with the relief sought and the schedule proposed in this Motion.

Dated: June 13, 2024

Respectfully submitted,

By: /s/ David F. Abernethy

David F. Abernethy

PA Bar No. 36666

Faegre Drinker Biddle & Reath LLP

One Logan Square, Suite 2000

Philadelphia, Pennsylvania 19103

Tel: 215-988-2503

Fax: 215-988-2757

*Attorneys for Defendant Johnson &
Johnson Consumer Inc.*

CERTIFICATE OF SERVICE

I, David F. Abernethy, hereby certify that on June 13, 2024, I caused a true and correct copy of the foregoing motion to be filed using the Court's ECF system. Service on counsel was achieved using the ECF system.

By: /s/ David F. Abernethy

David F. Abernethy

PA Bar No. 36666

Faegre Drinker Biddle & Reath LLP

One Logan Square, Suite 2000

Philadelphia, Pennsylvania 19103

Tel: 215-988-2503

Fax: 215-988-2757